

# O'TOOLE SCRIVO

A LIMITED LIABILITY COMPANY

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March 14, 2025

**VIA ECF**

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *In re: Insulin Pricing Litigation*, MDL No. 3080  
Case No. 2:23-md-03080-BRM-RLS**

Dear Judge Singh:

We represent UnitedHealth Group Incorporated; OptumRx, Inc.; Optum, Inc.; and OptumInsight, Inc. (together, "OptumRx"), Defendants in the above captioned matter together with Evernorth Health, Inc. (f/k/a Express Scripts Holding Company); Express Scripts, Inc.; Express Scripts Administrators, LLC; ESI Mail Pharmacy Service, Inc.; Express Scripts Pharmacy, Inc.; Medco Health Solutions, Inc., and The Cigna Group ("ESI"); and CVS Health Corporation; CVS Pharmacy, Inc.; Caremark Rx, L.L.C.; CaremarkPCS Health, L.L.C.; and Caremark, L.L.C. ("CVS") (together, "PBM Defendants").

On February 28, 2025, at OptumRx's request, Plaintiffs filed under temporary seal a Letter from Plaintiffs Re Custodian and Search-Term Disputes Involving PBM Defendants [ECF No. 439]. The current deadline to file a motion to seal in accordance with Local Civil Rules 5.3(c) and 7.1 is today, March 14, 2025.

The PBM Defendants have reviewed this filing and concluded that the materials therein do not need to remain under seal. Plaintiffs take no position as the subject material does not pertain to them. As such, we write to request that the temporary seal for Plaintiffs' February 28, 2025 filing [ECF No. 439] be lifted. Though the informal motions related to OptumRx's submissions e-mailed to Your Honor on February 28, 2025 and March 5, 2025 have now been terminated [ECF No. 463], OptumRx will re-file those submissions on the docket should Your Honor wish that it do so.

If this request is acceptable, we ask that Your Honor endorse this Letter as "So Ordered" and have it entered on the Court's docket.

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We thank the Court for its consideration and remain available to answer any questions it may have.

Respectfully submitted,

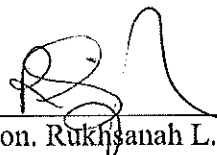
/s/ Thomas P. Scrivo  
Thomas P. Scrivo

/s/ Liz Broadway Brown  
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Cc: Honorable Brian R. Martinotti, U.S.D.J.  
All counsel of record (via ECF)

**SO ORDERED**

on this 17th day of March 2025

  
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Hon. Rukhsanah L. Singh, U.S.M.J.

\* The Clerk of the Court shall UNSEAL the Letter pending at Docket Entry Number 439. The Clerk of the Court shall also TERMINATE the informal Motion pending at Docket Entry Number 467.